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9	LINITED STA	ΓES DISTRICT COURT	
10			
11	NORTHERN DISTRICT OF CALIFORNIA		
	SAN FRANCISCO DIVISION		
12	THE CENTER FOR INVESTIGATIVE) No. 20-cv-00608-SK	
13	REPORTING and AURA BOGADO,)) STIPULATION CONTINUING INITIAL CASE	
14	Plaintiffs,) MANAGEMENT CONFERENCE AND ORDER) AS MODIED	
15	V.)	
16	UNITED STATES DEPARTMENT OF	}	
17	HEALTH AND HUMAN SERVICES,))	
18	Defendant.)	
		_)	
19	Plaintiffs The Center for Investigative Reporting and Aura Bogado ("Plaintiffs") and defendant		
20	United States Department of Health and Human Services ("Defendant"), through their undersigned		
21	counsel, hereby stipulate pursuant to Civil Local Rule 6-2 and 7-12, subject to the approval of the Court,		
22	that the initial case management conference ("CMC") set for March 14, 2022 at 1:30 p.m. be continued		
23	to April 11, 2022 at 1:30 p.m., with the parties' joint CMC statement due on April 4, 2022. This		
24	stipulation is based on the following facts:		
25	1. This action, filed on January 27, 2020 under the Freedom of Information Act ("FOIA"),		
26	identifies five FOIA requests directed to Defendant, dated July 10, 2019, November 27, 2019, December		
27	2, 2019, December 6, 2019, and December 17, 2019, that are the subject of this litigation. Since the		
28	filing of the lawsuit, the parties have engaged in cooperative and productive communications regarding		
	STIPULATION CONTINUING INITIAL CASE MANAGEMENT CONFERENCE AND ORDER 3:20-CV-00608-SK		

the documents sought in the requests and the search for and release of responsive records.

- 2. In their prior submissions to the Court, the parties reported that they had reached an agreement that would resolve this action and were completing the final part of that agreement, *i.e.*, Defendant's review and production of significant incident reports to Plaintiffs at an agreed-upon rate. ECF No. 48 at 2. Most recently, on February 7, 2022, the parties stipulated and respectfully requested that the Court continue their CMC from February 14, 2022 until March 14, 2022 to give them time to continue this process, ECF No. 56, which the Court granted, continuing the parties' CMC until March 14, 2022, with the parties' CMC statement due by March 7, 2022. ECF Nos. 57.
- 3. On December 21, 2021, Defendant completed its production of significant incident reports to Plaintiffs, and the parties have been meeting and conferring regarding whether further action is needed before they may resolve this action. In order to continue this process, the parties stipulate and respectfully request that the Court continue the CMC currently scheduled for March 14, 2022 at 1:30 p.m. until April 11, 2022 at 1:30 p.m. The parties will provide a further update to the Court regarding their progress in either a request and proposed order continuing the CMC or a joint CMC statement on or before April 4, 2022. The parties respectfully submit that this is the most efficient manner to proceed and will conserve the parties' and Court's resources.

In accordance with Civil Local Rule 5-1(h)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.

Respectfully submitted,

DATED: March 7, 2022

STEPHANIE M. HINDS
United States Attorney

/s/ Savith Iyengar
SAVITH IYENGAR
Assistant United States Attorney

DATED: March 7, 2022

THE CENTER FOR INVESTIGATIVE REPORTING
/s/ D. Victoria Baranetsky
D. VICTORIA BARANETSKY
Attorney for Plaintiffs

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ORDER Upon the parties' request, the Court HEREBY CONTINUES the case management conference from March 14, 2022 at 1:30 p.m. until April 18, 2022 at 1:30 p.m. The parties shall file a joint case management statement by no later than April 11, 2022. IT IS SO ORDERED. shi kun Dated: March 7, 2022 United States Magistrate Judge

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